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Attorneys for Defendants
UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

V.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF DEFENDANT UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO, LLC'S OPPOSITION TO
WAYMO'S MOTION *IN LIMINE* NO. 18
TO PRECLUDE RELIANCE ON THE
STROZ FRIEDBERG DUE DILIGENCE
INVESTIGATION**

Judge: Hon. William H. Alsup
Trial Date: December 4, 2017

1
2 I, Maxwell V. Pritt, declare as follows:
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5 1. I am Counsel at the firm Boies Schiller Flexner LLP representing Defendants Uber
6 Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good
7 standing of the Bar of the State of the California. I make this declaration in support of Defendants Uber
8 Technologies, Inc.’s and Ottomotto LLC’s Opposition to Waymo’s Motion *In Limine* No. 18 to Preclude
9 Reliance on the Stroz Friedberg Due Diligence Investigation. I make this declaration based on personal
10 knowledge and if called as a witness, I could and would competently testify to the matters set forth
11 herein.
12

13 2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the
14 October 3, 2017, deposition of Justin Suhr.
15

16 3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the transcript of the
17 October 6, 2017, deposition of Hanley Chew.
18

19 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the transcript of the
20 October 3, 2017, deposition of Eric Friedberg.
21

22 5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the transcript of the
23 October 17, 2017, deposition of Mary Fulginiti.
24

25 6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the transcript of the
26 October 20, 2017, deposition of Melanie Maugeri.
27

28 7. Attached as **Exhibit 6** is a true and correct copy of excerpts of the transcript of the
October 2, 2017, deposition of Angela Padilla.
I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of
November, 2017, at Oakland, California.

9 8. Attached as **Exhibit 7** is a true and correct copy of excerpts of the transcript of the
September 29, 2017, deposition of Cameron Poetscher.
10
11 9. Attached as **Exhibit 8** is a true and correct copy of Waymo’s Third Amended Witness
List served on November 15, 2017.
12
13

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of
15 November, 2017, at Oakland, California.
16

17

/s/ Maxwell V. Pritt
18 Maxwell V. Pritt

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has concurred in this filing.

/s/ Karen L. Dunn
Karen L. Dunn